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April 5, 2002

SENT VIA FEDERAL EXPRESS

Mr. Thomas P. Turner
Assistant Regional Counsel
United States Environmental Protection Agency
Region 5
CS-3T
77 West Jackson Boulevard
Chicago, Illinois 60604-2402



RE: Clayton Chemical Superfund Site
Sauget, Illinois

Dear Mr. Turner:

Please be advised that we represent Parsons Company, Inc. ("Parsons"), 1386 State Route 117, Roanoke, IL 61561. Parsons was advised by letter dated March 6, 2002 that it may be a potentially responsible party (PRP) at the above-mentioned site. At a meeting held on Thursday, March 28, 2002, Parsons was instructed to submit a response to the USEPA on its position as to whether it was appropriately identified as a PRP and, if so, whether it wished to participate in a resolution of the matter. It was also advised at that meeting that only those involved with 10,000 or more gallons of waste, from 1995 to 1998, would be considered as PRP's.

According to records provided by the ILEPA, Parsons contributed less than 3.5 tenths of 1 percent of the total volume represented by the 31 currently named PRP's.

Parsons has begun an investigation of its own records, and the records of its transporter(s), in order to determine the nature and degree of involvement it had at the Clayton Chemical site during the time in question. The investigation is not yet complete. Based on the minimal amount of information available as of this date, Parsons is unable to ascertain the true extent of its responsibility in this matter. In addition, the USEPA has not yet determined the extent of the response activities to be performed at the site.

Information provided to-date indicates that Parsons is unlikely to have contributed in any way to soil contamination at the site, and there is significant uncertainty regarding the source and composition of the liquids currently stored at the site. This information is crucial to the correct determination of potentially responsible parties, and to the fair and accurate assessment of their individual level of responsibility.

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Parsons participated in a preliminary meeting on April 3rd, via conference call, with many of the PRP's. Due to the insufficient amount of time available for preparation prior to that meeting, a follow-up meeting has been scheduled for April 24, 2002. Parsons will actively participate in that meeting.

After further evaluation, and after further discussion with the other PRP's, Parsons will be more adequately prepared to define the specific actions it will voluntarily undertake to participate in reasonable and appropriate mitigation and remediation measures. Due to the USEPA's request for a response within a very short time frame, Parsons is unable to more fully articulate its position at this time.

We look forward to cooperatively working with the USEPA to resolve this issue.

Best regards,

Very truly yours,

ROBERT G. WALSH, P.C.

By: _____
Robert G. Walsh, Esq.

Encs.

cc: client

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